

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
Charlottesville Division

JANE DOE,

Plaintiff,

v.

THE RECTOR AND VISITORS OF
THE UNIVERSITY OF VIRGINIA,

Defendant.

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Case No. 3:23-cv-00018-RSB

DEFENDANT’S OMNIBUS MOTION IN LIMINE

Defendant the Rector and Visitors of the University of Virginia (“UVA”) moves the Court to preclude Plaintiff from discussing in her opening statement, and from soliciting or offering at trial, any testimony, evidence, statement or argument concerning the following:

Motion in Limine #1: Care provided to Plaintiff by her Health Care Providers and medical records of that care.

Motion in Limine #2: Information about John Roe appearing on UVA’s website after his resignation.

Motion in Limine #3: Financial damages not properly disclosed under Fed. R. Civ. P. 26(a)(1)(A)(iii).

Motion in Limine #4: Plaintiff’s treatment for emotional distress and expenses for the same.

Motion in Limine #5: Diagnoses of Plaintiff’s claimed medical or mental health conditions offered by Plaintiff or other lay witnesses.

Motion in Limine #6: Law school admission and why Plaintiff has not gone to law school.

Motion in Limine #7: Dismissed claims.

Motion in Limine #8: John Roe's sexual assaults of Plaintiff.

Motion in Limine #9: UVA's Title IX policies and federal regulations not applicable to Plaintiff's Title IX complaint and UVA's actions under not applicable policies in other Title IX matters that do not involve the Plaintiff.

Motion in Limine #10: UVA's training of its employees on its Title IX Policy.

Motion in Limine #11: Romantic relationships between current and former UVA employees with any student other than Plaintiff.

Motion in Limine #12: Plaintiff's attorney-advisor in the Title IX investigation being in cahoots with UVA or failing to adequately advocate for Plaintiff.

Motion in Limine #13: UVA treating faculty/staff Title IX respondents more favorably than student Title IX respondents or complainants.

Motion in Limine #14: UVA being liable under Title IX for its response before Plaintiff's Title IX complaint was filed on March 15, 2020.

Motion in Limine #15: Contact that John Roe had with UVA employees after completion of the Title IX investigation and proceedings on August 6, 2021.

Motion in Limine #16: Letters submitted to Provost M. Elizabeth Magill in July 2021 regarding John Roe.

Motion in Limine #17: Plaintiff's medical records designated in bulk.

Motion in Limine #18: Plaintiff's witnesses who were disclosed not, or who were not properly disclosed, under Rule 26(a)(1)(A)(i).

WHEREFORE, UVA respectfully requests the Court to grant its Omnibus Motion *in Limine* in all respects.

Dated: November 12, 2024

Respectfully submitted,

**THE RECTOR AND VISITORS OF THE
UNIVERSITY OF VIRGINIA**

By Counsel: /s/ Christopher P. Bernhardt

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CERTIFICATE

I hereby certify that on November 12, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system.

/s/ Christopher P. Bernhardt
Christopher P. Bernhardt* (VSB No. 80133)
Assistant Attorney General